

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

POLICE AND FIRE RETIREMENT
SYSTEM OF THE CITY OF DETROIT,
PLYMOUTH COUNTY RETIREMENT
SYSTEM, STATE-BOSTON
RETIREMENT SYSTEM, and MICHAEL
GOLDE, On Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

v.

SAFENET, INC., ANTHONY A. CAPUTO,
KENNETH A. MUELLER, CAROLE D.
ARGO, THOMAS A. BROOKS, IRA A.
HUNT, Jr., BRUCE R. THAW, ARTHUR
L. MONEY, SHELLEY A. HARRISON,
and ANDREW E. CLARK

Defendants.

Lead Case No. 06 Civ. 5797 (PAC)

**NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF PROPOSED CLASS SETTLEMENT**

PLEASE TAKE NOTICE that as soon as counsel may be heard, Lead Plaintiffs the Police and Fire Retirement System of the City of Detroit ("Detroit P&F"), the Plymouth County Retirement System ("Plymouth"), and State-Boston Retirement System ("State-Boston") (collectively "Lead Plaintiffs") will move before the Honorable Paul A. Crotty, U.S.D.J., at the Federal Courthouse, 500 Pearl Street, New York, New York 10007 for an order pursuant to Federal Rule of Civil Procedure 23(e) for preliminary approval of a proposed Class settlement, certification of the proposed Settlement Class for settlement purposes only, the appointment of Detroit P&F and Plymouth as representatives for the proposed Class, the appointment of Michael Golde as representative for the Subclass, the appointment of Labaton Sucharow LLP and

Bernstein Litowitz Berger and Grossman LLP as counsel for the Class and Subclass, and for approval of the forms of notice and other matters related to issuing notice to the Class.

PLEASE TAKE FURTHER NOTICE that a Stipulation and Agreement of Settlement and a proposed Preliminary Approval Order Providing for Notice and Hearing in Connection With Proposed Class Action Settlement, each with annexed exhibits, are being submitted herewith.

Dated: New York, New York
September 13, 2010

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